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ABSTRACT

During the early years of Title I, parents were provided with little information about the program and were not encouraged to participate. After evaluations of the program revealed little parental awareness of the program, the original provisions for parent involvement through Parent Advisory Councils (PACs) were made more explicit. There are many barriers to parental involvement: some educators do not believe parents should make educational decisions; other school officials simply regard parent involvement as a low priority; some school personnel have cultural or racial biases; others fear disclosure of poor administrative practices. The Federal Education Project, which assists parents and PACs in filing formal complaints, has become aware of a number of parent complaints regarding PACs. Parents complain that schools withhold information from PACs, institute illegal election procedures, dominate the PAC, and do not respond to recommendations. The willingness and performance of states in monitoring the implementation of PAC requirements has been extremely varied. The federal government has shown that parent involvement is a low priority among its Title I responsibilities. It is clear from the Federal Education Project's experience that noncompliance with both the letter and spirit of Title I's legal requirements for parent involvement is pervasive. A number of recommendations are suggested. (Author/JM)

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PROBLEMS IN IMPLEMENTING STATUTORY REQUIREMENTS FOR TITLE I ESEA PARENT ADVISORY COUNCILS

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Introduction - A Brief History of Title I ESEA

Prior to 1965 the federal role in elementary and secondary education was extremely limited. Until 1965 the U.S. Office of Education was little more than a collector of data for public education programs.

The passage of the Elementary and Secondary Education Act of 1965 created a dramatic shift and expansion of the federal government's role in education to the point which it now affects virtually every public school student in the United States. Title I is the most significant portion of ESEA in terms of dollars authorized by law and actually appropriated by Congress.

Events surrounding the passage of ESEA and the initial implementation of Title I are instructive in trying to understand Title I's record of success, the evaluation of the federal government's enforcement of the law and regulations and the strategies of educational advocacy groups concerned with the education of minority and low-income children. It also provides some clues to the reasons for so many barriers to parent involvement in Title I.

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TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

THE DEBATE OVER THE APPROPRIATENESS AND DESIRABILITY OF FEDERAL AID TO EDUCATION WAS WAGED FOR SEVERAL YEARS PRIOR TO THE PASSAGE OF ESEA IN 1965. ONE BASIC ARGUMENT AGAINST SUCH AID WAS BASED ON THE VIEW THAT SINCE EDUCATION WAS A STATE RESPONSIBILITY, THE FEDERAL GOVERNMENT SHOULD PLAY NO ROLE IN ESTABLISHING FORMAL POLICIES REGARDING THE OPERATION OF PUBLIC SCHOOLS. SOME ARGUED THAT ONCE FEDERAL FINANCIAL AID FOUND ITS WAY INTO THE SCHOOLS THE FEDERAL GOVERNMENT WOULD BEGIN PRESCRIBING AND MANDATING RULES AND POLICIES TO BE FOLLOWED BY STATE AND LOCAL EDUCATIONAL INSTITUTIONS AND EDUCATORS.

ANOTHER PART OF THE DEBATE CONCERNED THE PROVISION OF FEDERAL AID TO PRIVATE SCHOOLS. EVENTUALLY AN ESSENTIAL COMPROMISE BETWEEN PUBLIC AND PRIVATE SCHOOL INTERESTS WAS WORKED OUT WITHIN THE CONTEXT OF TITLE I BY SPECIFYING THAT CHILDREN WHO WERE ELIGIBLE TO RECEIVE TITLE I SERVICES COULD DO SO REGARDLESS OF WHETHER THEY ATTENDED PUBLIC OR PRIVATE SCHOOLS. THE FEDERAL AID WAS CONSIDERED A BENEFIT TO THE CHILD AND NOT THE SCHOOL. WITH THIS COMPROMISE IN PLACE AND THE MASTERFUL PRESIDENT LYNDON JOHNSON AT WORK TO LINE UP ESSENTIAL VOTES, IT WAS PASSED BY CONGRESS WITH UN-PRECEDENTED SPEED. THE LEGISLATION WAS APPROVED ON APRIL 11, 1965 AND MONEY BEGAN TO FLOW TO APPROXIMATELY 16,000 SCHOOL DISTRICTS ACROSS THE NATION IN THE FALL OF 1966 WITHOUT THE BENEFIT OF REGULATIONS SPELLING OUT HOW THE PROGRAM WAS TO

BE IMPLEMENTED, WITHOUT THE EXISTENCE OF A FEDERAL STRUCTURE TO ADMINISTER AND ENFORCE THE PROGRAM, AND WITHOUT A CLEAR UNDERSTANDING OF THE SPECIAL PURPOSE OF THIS NEW SOURCE OF SCHOOL REVENUE.

THE LEGISLATIVELY DEFINED PURPOSE AND CATEGORICAL NATURE OF TITLE I WAS NOT WELL UNDERSTOOD OR SUPPORTED BY MOST LOCAL SCHOOL ADMINISTRATORS. TO THEM THE DEBATE OVER FEDERAL AID TO EDUCATION HAD BEEN RESOLVED IN FAVOR OF SUCH AID AND THE DISTINCTION BETWEEN GENERAL AID AND SPECIAL PURPOSE OR CATEGORICAL AID WAS LOST OR INCONSEQUENTIAL.

EARLY HOPES FOR THE SUCCESS OF TITLE I IN CLOSING ACHIEVEMENT GAPS BETWEEN UNDERACHIEVING CHILDREN IN LOW-INCOME AREAS AND THEIR AGE AND GRADE LEVEL PEERS WERE DASHED AS EVALUATIONS OF THE PROGRAM INDICATED LITTLE IF ANY CHANGE. ALARMED BY THE DISAPPOINTING AND UNIMPRESSIVE RECORD OF TITLE I'S SUCCESS AND OFTEN REPEATED REPORTS OF ILLEGAL EXPENDITURES OF TITLE I FUNDS, IN 1968 SEVERAL CIVIL RIGHTS ORGANIZATIONS CONDUCTED AN EXTENSIVE INVESTIGATION OF TITLE I. THE REPORT OF THEIR INVESTIGATION, TITLE I: IS IT HELPING POOR CHILDREN?, CONCLUDED THAT THERE HAD BEEN LITTLE ACTUAL OPERATION OF TITLE I PROGRAMS WITHIN THE PARAMETERS INTENDED BY CONGRESS SO THAT NO JUDGMENT COULD BE MADE ABOUT THE MERITS AND POTENTIAL OF REMEDIATION. AFTER FURTHER REVIEW AND VERIFICATION OF THE REPORT'S FINDINGS, CONGRESS AND

THE OFFICE OF EDUCATION CONCLUDED THAT LITTLE TITLE I MONEY HAD ACTUALLY REACHED THE CHILDREN FOR WHOM THE PROGRAM WAS DESIGNED AND THAT PARENTAL AWARENESS OF AND INVOLVEMENT IN THE PROGRAM WAS PRACTICALLY NON-EXISTENT. AS A RESULT, THE LAW WAS AMENDED TO INCLUDE TIGHTER RESTRICTIONS ON THE USE OF TITLE I FUNDS AND A MEANS FOR ENFORCING THE REQUIREMENTS FOR THE EQUITABLE DISTRIBUTION OF STATE AND LOCAL FINANCIAL RESOURCES AMONG SCHOOLS. ALSO, PROVISIONS FOR PARENT INVOLVEMENT IN TITLE I HAVE BEEN MADE MORE EXPLICIT AND DETAILED WITH EACH CONGRESSIONAL REAUTHORIZATION OF TITLE I AND THROUGH CHANGES IN REGULATIONS AND GUIDELINES ISSUED BY THE OFFICE OF EDUCATION IN ORDER TO ASSURE PARENTS A ROLE IN THE EDUCATION OF THEIR CHILDREN.

DURING THE EARLY YEARS OF TITLE I, PARENTS WERE PROVIDED WITH LITTLE INFORMATION ABOUT THE PROGRAM AND WERE NOT ENCOURAGED TO PARTICIPATE IN THE PLANNING, IMPLEMENTATION OR EVALUATION OF PROJECTS. IN RETROSPECT THIS IS NOT SURPR'SING SINCE SO MANY SCHOOL SYSTEMS WERE MAKING LITTLE ATTEMPT TO COMPLY WITH LEGAL RESTRICTIONS ON THE USE OF THE FUNDS OR REQUIREMENTS FOR EQUITABLE DISTRIBUTION OF STATE AND LOCAL DOLLARS. CONSEQUENTLY, BOTH THE CONGRESS AND THE OFFICE OF EDUCATION GRADUALLY MADE THE MANDATE FOR PARENT INVOLVEMENT MORE EXPLICIT. ALONG WITH INCREASED EFFORTS TO COMPLY WITH TITLE I FUNDING REQUIREMENTS, SOME SCHOOL SYSTEMS HAVE IMPLEMENTED THE PARENT INVOLVEMENT REQUIREMENTS OF THE

ACT. HOWEVER, THE RANGE OF COMPLIANCE STILL SWINGS FROM A COMPLETE IGNORING OF THE MANDATE TO SET UP PARENT ADVISORY COUNCILS (PACs), TO EFFORTS TO MINIMIZE THEIR IMPACT, TO LARGELY SUCCESSFUL PARENT INVOLVEMENT COMPONENTS OF TITLE I.

PROBLEMS IN IMPLEMENTING THE TITLE I PARENT INVOLVEMENT REQUIREMENTS

IN LOOKING AT THE VARIOUS BARRIERS THAT TITLE I PARENTS HAVE FACED IN ATTEMPTING TO PLAY A ROLE IN THE EDUCATION OF THEIR CHILDREN AND THE PROBLEMS THAT HAVE ACCOMPANIED IMPLEMENTATION OF THE LAW'S PARENT INVOLVEMENT REQUIREMENTS, IT IS IMPORTANT TO RECOGNIZE THE GOALS OR PURPOSES OF PARENT INVOLVEMENT.

THE RATIONALE FOR PARENT INVOLVEMENT IN TITLE I CAN BE SUMMARIZED AS FOLLOWS:

1. WHEN PARENTS ARE ACTIVELY INVOLVED IN THE EDUCATION OF THEIR CHILDREN, THEIR CHILDREN'S EDUCATIONAL ACHIEVEMENT IS ENHANCED.

2. PARENTS WHO ARE INVOLVED IN ALL ASPECTS OF TITLE I, INCLUDING THE PLANNING OF PROJECTS, THEIR IMPLEMENTATION, AND THEIR EVALUATION, CAN EFFECTIVELY FUNCTION AS LOCAL LEVEL MONITORS AND HELP ASSURE THAT TITLE I FUNDS

ARE USED ACCORDING TO THE LAW AND REGULATIONS.

3. THROUGH TITLE I PARENT ADVISORY COUNCILS, PARENTS AND OTHER PAC MEMBERS CAN FUNCTION AS LIAISONS BETWEEN THE COMMUNITY AND THE SCHOOL AND HELP TO FOSTER BADLY NEEDED COMMUNITY SUPPORT FOR THE SCHOOLS.

A VARIETY OF ATTITUDES, ACTIONS, INACTIONS, AND BELIEFS HAVE CREATED BARRIERS TO EFFECTIVE IMPLEMENTATION OF THE REQUIREMENTS FOR SETTING UP PARENT ADVISORY COUNCILS AND INVOLVING THEM IN THE ARRAY OF ACTIVITIES THAT WOULD FOSTER ACHIEVEMENT OF THESE GOALS.

MANY SCHOOL OFFICIALS AND TEACHERS SIMPLY DO NOT BELIEVE THAT PARENTS SHOULD PLAY A ROLE IN EDUCATION DECISION MAKING. THEY JEALOUSLY GUARD THEIR PROFESSIONAL CREDENTIALS WHICH MAKE THEM EXPERTS IN EDUCATING CHILDREN AND DO NOT PERCEIVE PARENTS AS CAPABLE OF UNDERSTANDING THE EDUCATIONAL PROCESS SUFFICIENTLY TO MAKE ANY USEFUL CONTRIBUTION TO DECISIONS ABOUT NEEDS OF CHILDREN, TEACHING STRATEGIES, AND DESIGN OF PROGRAMS. THIS ATTITUDE TOWARDS PARENTS AS INCOMPETENT WHEN IT COMES TO EDUCATIONAL MATTERS LEADS TO A POWER STRUGGLE WHICH EXHIBITS ITSELF IN A VARIETY OF WAYS, INCLUDING A REFUSAL BY SCHOOL OFFICIALS TO PROVIDE

INFORMATION THAT IS ESSENTIAL TO HAVING AN INFORMED OPINION OR TO CARRYING OUT THE ROLE DESIGNATED FOR PACs. ATTEMPTS TO CONTROL THE ACTIVITIES OF THE PACs AND TO DIRECT PAC MEMBERS AWAY FROM FULL INVOLVEMENT, AND SIMPLY IGNORING ANY INPUT OR INQUIRIES OF THE PAC ARE FREQUENT RESULTS OF SUCH POWER STRUGGLES.

IN SOME INSTANCES WHILE SCHOOL OFFICIALS ARE NOT HOSTILE TO PARENT INVOLVEMENT, THEY HAVE NOT REGARDED IT AS A HIGH ENOUGH PRIORITY TO MAKE IT WORK EFFECTIVELY. THIS ATTITUDE HAS BEEN FOSTERED BY A LACK OF LEADERSHIP OR INTEREST IN PARENT INVOLVEMENT AT THE FEDERAL AND STATE LEVELS WHICH IN TURN SIGNALS A LACK OF IMPORTANCE OF COMPLIANCE WITH PARENT INVOLVEMENT REQUIREMENTS TO LOCAL SCHOOL OFFICIALS. IN COMMUNITIES WHERE LOW-INCOME PARENTS HAVE NOT BEEN ACTIVELY INVOLVED IN SCHOOL AFFAIRS OR HAD OPPORTUNITIES TO DEVELOP ORGANIZING AND LEADERSHIP SKILLS, THEY ARE ESPECIALLY DEPENDENT UPON THE EFFORTS OF SCHOOL OFFICIALS TO FACILITATE THE PAC'S OPERATION IN SUCH WAYS AS PROVIDING INFORMATION THAT IS UNDERSTANDABLE AND TIMELY. FOR EXAMPLE, THE PROCESS FOR NOMINATING AND ELECTING PAC MEMBERS CAN BE ENORMOUSLY COMPLICATED IF PARENTS ARE NOT ADEQUATELY NOTIFIED OF THE PURPOSE AND ROLE OF PACs, AND THE TIME, PLACE AND PROCEDURES FOR NOMINATING AND ELECTING THEIR MEMBERS. WHEN THE ROLE OF THE PACs IS NOT PERCEIVED AS IMPORTANT BY SCHOOL OFFICIALS, OFTEN SUFFICIENT PLANNING AND

RESOURCES TO HELP THEM OPERATE ARE MISSING.

SOME SCHOOL PERSONNEL ARE UNABLE TO WORK EFFECTIVELY WITH LOW-INCOME PARENTS BECAUSE OF CULTURAL AND RACIAL BIASES OR BECAUSE THEY FAULT THE VICTIMS OF POVERTY FOR THEIR CONDITION. RESENTMENT, LACK OF RESPECT, AND STEREOTYPES CREATE COMMUNICATIONS BARRIERS THAT TECHNICAL EXPERTISE AND KNOW-HOW FIND HARD TO OVERCOME.

IN RECENT YEARS THE FEDERAL GOVERNMENT HAD SOME STATE EDUCATIONAL AGENCIES HAVE IMPROVED SOMEHWAT IN PROVIDING INFORMATION TO LOCAL SCHOOL OFFICIALS ON WHAT THEY ARE REQUIRED BY STATUTE AND REGULATION TO DO IN ORDER TO COMPLY WITH THE PARENT INVOLVEMENT REQUIREMENTS. HOWEVER, THE IMPORTANCE OF THE REQUIREMENTS AND INFORMATION ON HOW TO EFFECTIVELY WORK WITH PACs NEEDS TO BE ADDRESSED MORE FORCEFULLY. MANY SCHOOL OFFICIALS LACK THE KNOW-HOW AND EXPERTISE TO WORK WITH PARENTS, ESPECIALLY MINORITY AND LOW-INCOME PARENTS AND THEY NEED TECHNICAL ASSISTANCE IN OVERCOMING THESE PROBLEMS.

EFFORTS TO THWART PARENT INVOLVEMENT ARE OFTEN BASED ON A FEAR THAT BY "MEDDLING" IN SCHOOL AFFAIRS, PARENTS WILL UNCOVER POOR OR ILLEGAL ADMINISTRATIVE PRACTICES. IN SOME INSTANCES LOCAL RULES OR RESTRICTIONS ON PARENT PARTICIPATION OR ACCESS TO INFORMATION HAVE BEEN DESIGNED TO DISCOURAGE PARTICULAR PARENTS WHO ARE VIEWED AS TROUBLE MAKERS.

PAC MEMBERS HAVE BEEN PROVIDED WITH INSUFFICIENT INFORMATION AND TRAINING TO UNDERSTAND THE PURPOSE OF THE PAC

AND HOW THEY SHOULD GO ABOUT FULFILLING THEIR ROLE. THIS HAS LED TO FRUSTRATION AND DISCOURAGEMENT FOR MEMBERS AND POOR RELATIONSHIPS WITH SCHOOL OFFICIALS. THESE KINDS OF PROBLEMS FOSTER ADDITIONAL HOSTILITY, ESPECIALLY ON THE PART OF PARENTS WHO ALREADY BELIEVE THAT THE SCHOOL SYSTEM HAS FAILED TO CARE ABOUT AND EDUCATE THEIR CHILDREN.

TITLE I COMPLAINTS RELATING TO TITLE I PARENTAL INVOLVEMENT REQUIREMENTS

SINCE ITS BEGINNING IN 1975, THE FEDERAL EDUCATION PROJECT HAS ASSISTED PARENTS AND PAC MEMBERS WITH FILING ADMINISTRATIVE COMPLAINTS UNDER TITLE I AND HAVING THEM SATISFACTORILY RESOLVED. PRIOR TO THE EDUCATION AMENDMENTS OF 1978, P.L. 95-56L, WHICH REAUTHORIZED TITLE I, THE TITLE I LAW DID NOT PROVIDE OR SPECIFY ANY MECHANISMS FOR COMPLAINT RESOLUTION AT THE LOCAL OR THE FEDERAL LEVEL. HOWEVER, WITH THE AMENDMENT OF TITLE I IN 1978, LOCAL AND STATE EDUCATIONAL AGENCIES AND THE OFFICE OF EDUCATION NOW ARE REQUIRED TO HAVE WRITTEN COMPLAINT PROCEDURES THAT MEET MINIMUM STANDARDS SET BY THE LAW.

THE FEDERAL EDUCATION PROJECT HAS ASSISTED PAC MEMBERS IN UTILIZING THE FORMAL COMPLAINT PROCEDURES SPELLED OUT IN P.L. 95-56L AND HAS ALSO ADVISED THEM ON HOW TO RESOLVE COMPLAINTS INFORMALLY. THE FOLLOWING DISCUSSION IS BASED ON INFORMATION FROM BOTH FORMAL AND INFORMAL COMPLAINTS.

Access to Information. The most frequent complaint that is brought to our attention is the failure of school officials to provide information to PACs that is essential to the fulfillment of their legally mandated role. This includes copies of the law, regulations, current and prior Title I applications and evaluations, and training materials. Keeping PACs ignorant of the law, regulations, Title I school targeting and spending decisions, and the educational results of the program is an effective way to keep them powerless.

PAC Membership Elections. Irregularities in PAC membership nominations and elections are the most frequent subject of formal complaints. Generally, these complaints have dealt with the assignment to the PAC, or restriction from eligibility for election, of a particular category of individuals. Some school districts have either designated a certain number of slots on the PAC for teachers or administrators, or ruled all school personnel ineligible.

The 1974 Title I statute specified that parents were to select their own representatives to serve on PACs. The 1978 statute mandated that an election be the selecting mechanism. Any state or local rules or policies about who can or cannot serve on the PAC would be illegal interference with parents' rights to elect PAC members. The reasons for

THE FREQUENCY OF THIS TYPE OF MANIPULATION OF THE PACs' MEMBERSHIP ARE VARIED AND ARE BASED ON ASSUMPTIONS THAT TEACHERS OR ADMINISTRATORS KNOW BEST HOW THE PAC SHOULD OPERATE AND WHAT IT SHOULD DO, OR THAT IT IS ONLY FAIR THAT ADMINISTRATORS HAVE THEIR OWN REPRESENTATIVES ON THE COUNCILS. WE ALSO OFTEN HEAR PATRONIZING STATEMENTS BY SCHOOL OFFICIALS SUGGESTING THAT PARENTS CANNOT BE TRUSTED TO KNOW WHO CAN OR CANNOT REPRESENT THEIR INTERESTS WELL.

A HOST OF OTHER ELECTION IRREGULARITIES HAVE BEEN THE SUBJECT OF NUMEROUS COMPLAINTS, MANY OF WHICH DEMONSTRATE EITHE GROSS INCOMPETENCE IN FOLLOWING A REASONABLE, EFFICIENT, LEGAL PROCESS FOR HOLDING NOMINATIONS AND ELECTIONS, OR THAT TOO LITTLE TIME, ATTENTION AND INTEREST IS DEVOTED TO MAKING THE PROCESS WORK WELL. OFTEN THE CONVENIENCE OF THE PROCESS FOR PARENTS IS COMPLETELY OVERLOOKED AND THEN PARENTS ARE FAULTED FOR BEING APATHETIC WHEN THE ELECTION OR MEETING TURN-OUT IS POOR. A CHAOTIC NOMINATION AND ELECTION PROCESS QUICKLY DISCOURAGES PARENTS FROM PARTICIPATING IN PACs OR BELIEVING THAT THE SCHOOL SYSTEM PRIZES OR CARES ABOUT THEIR INVOLVEMENT. TO PARENTS THIS IS VIEWED AS A SLAP IN THE FACE OR ONE MORE EXAMPLE OF AN INSTITUTION THAT DOESN'T CARE.

<u>CONTROL OVER PAC MEETINGS</u>. SEEMINGLY ENDLESS STRUGGLES HAVE OCCURRED BETWEEN SCHOOL OFFICIALS, USUALLY THE TITLE I

COORDINATOR, AND PACs OVER WHO WILL CONTROL THE PAC. THESE STRUGGLES HAVE BEEN CHARACTERIZED BY SCHOOL OFFICIALS DETERMINING WHEN, WHERE, AND HOW OFTEN PACs SHOULD MEET: WHO SHOULD SEND OUT THE MEETING NOTICES; SET THE AGENDA; AND CHAIR THE MEETING. WHILE THE LAW AND REGULATIONS DO NOT ADDRESS THESE ISSUES ITEM BY ITEM, IT IS CLEAR THAT THE PAC IS MEANT TO BE A BODY REPRESENTING PARENTS, ESPECIALLY PARENTS OF TITLE I PARTICIPANTS. THE FEDERAL EDUCATION PROJECT HAS SUCCESSFULLY ARGUED THAT DECISIONS ON THESE MATTERS ARE TO BE MADE BY THE PAC MEMBERS THEMSELVES AND SHOULD BE ADDRESSED IN BY-LAWS DEVELOPED BY THE PAC FOR ITS OPERATION. EVEN WITH THE SUCCESSFUL RESOLUTION OF COMPLAINTS ADDRESSING THESE MATTERS, PACs ARE STILL HARASSED BY A REFUSAL OF SCHOOL OFFICIALS TO PERMIT PACs TO HOLD THEIR MEETINGS ON SCHOOL PROPERTY AT A TIME OF THEIR CHOOSING. THE FORMAL COMPLAINT PROCESS CANNOT CREATE GOOD WILL OR A SPIRIT OF COOPERATION WHERE SUCH ATTRIBUTES ARE LACKING. RATHER, TRAINING AND TECHNICAL ASSISTANCE FOR BOTH PAC MEMBERS AND SCHOOL OFFICIALS AND POSITIVE LEADERSHIP BY STATE AND FEDERAL OFFICIALS HOLD A GREATER PART OF THE SOLUTION TO THESE PROBLEMS.

RESPONSES TO PAC RECOMMENDATIONS. THE CLEARLY SPELLED-OUT RESPONSIBILITY OF TITLE I PACs IS " . . . ADVISING IT (THE LOCAL EDUCATIONAL AGENCY) IN THE PLANNING FOR, AND IMPLEMENTATION AND EVALUATION OF, ITS PROGRAMS AND PROJECTS

ASSISTED UNDER THIS TITLE (TITLE I)." (SECTION 125(B) OF P.L. 95-561)

INCREASINGLY, WE ARE RECEIVING COMPLAINTS FROM PAC MEMBERS SAYING THAT THEIR RECOMMENDATIONS ARE BEING IGNORED. WE SUSPECT THE REASON FOR THE INCREASE OF SUCH COMPLAINTS IS THAT MORE PACS HAVE GOTTEN THROUGH THEIR EARLIER STRUGGLES TO HAVE PACS ACTUALLY SET UP AND PROVIDED WITH SUFFICIENT INFORMATION, TRAINING AND OPPORTUNITIES TO COMMENT ON THE TITLE I APPLICATION AND NOW THEY CAN FOCUS ON MAKING SUBSTANTIVE RECOMMENDATIONS. THE ROLE OF PACS AS DEFINED BY THE LAW AND REGULATIONS IS ONE OF AN "ADVISORY" COUNCIL RATHER THAN THAT OF A BODY HAVING FINAL APPROVAL OR VETO POWER. TO DATE FORMAL COMPLAINTS HAVE NOT SUCCESSFULLY CHALLENGED THE NOTION THAT THE WHOLE CONCEPT OF PACS AND PARENT INVOLVEMENT IS UNDERMINED IF PAC RECOMMENDATIONS ARE IGNORED; HOWEVER, SUCH CHALLENGES CAN BE EXPECTED.

THE FEDERAL AND STATE ROLES IN MONITORING IMPLEMENTATION OF PAC REQUIREMENTS AND RESOLVING COMPLAINTS

THE 1978 EDUCATION AMENDMENTS SIGNIFICANTLY STRENGTHENED THE ROLE AND RESPONSIBILITIES OF STATES IN MONITORING IMPLEMENTATION OF AND ENFORCING TITLE I LEGAL REQUIREMENTS. STATES MUST NOW SUBMIT TO THE OFFICE OF EDUCATION AT LEAST EVERY THREE YEARS DETAILED MONITORING AND ENFORCEMENT PLANS.

ADDITIONALLY, EACH PLAN AFTER THE FIRST SUCH PLAN FILED WITH THE FEDERAL GOVERNMENT MUST INCLUDE A DESCRIPTION OF MONITORING ACTIVITIES UNDERTAKEN BY THE STATE IN THE YEARS SINCE THE PREVIOUS PLAN WAS SUBMITTED.

IT IS TOO EARLY TO SAY WHETHER OR NOT STATES ARE COMPLYING WITH THESE NEW REQUIREMENTS OR WHETHER IMPLEMENTATION OF THE REQUIREMENTS WILL HAVE ANY EFFECT ON IMPROVED STATE PERFORMANCE REGARDING MONITORING AND ENFORCING PARENT INVOLVEMENT REQUIREMENTS AT THE LOCAL LEVEL.

CERTAINLY THE CAPACITY, WILLINGNESS AND PERFORMANCE OF THE STATES HAS BEEN EXTREMELY VARIED. THE SEPTEMBER 19, 1977 REPORT OF THE NATIONAL INSTITUTE OF EDUCATON ON THE ADMINISTRATION OF COMPENSATORY EDUCATION FOUND THAT INSTEAD OF ENGAGING IN ENFORCEMENT ACTIVITIES, SOME STATES FUNCTIONED MORE AS BUFFERS BETWEEN THE FEDERAL GOVERNMENT AND LOCAL SCHOOL DISTRICTS. STATES ALSO WERE FOUND TO VARY IN THE FREQUENCY OF THEIR COMMUNICATIONS ABOUT TITLE I WITH LOCAL DISTRICTS AND IN THE VIGOR OF THEIR TECHNICAL ASSISTANCE EFFORTS. FOR EXAMPLE, SOME STATES SENT OUT NO MAILINGS ON TITLE I, HELD NO CONFERENCES OR WORKSHOPS AND ONE STATE MADE NO VISITS TO LOCAL SCHOOL DISTRICTS TO MONITOR FOR COMPLIANCE. SOME OF THESE DIFFERENCES WERE ATTRIBUTED TO THE VARYING SIZE OF STATE STAFF AVAILABLE FOR TITLE I PURPOSES. THE NUMBERS OF EMPLOYEES HIRED TO ADMINISTER TITLE I RANGED FROM 3 TO 101, WITH AN AVERAGE OF 13.

A FEW STATES HAVE TAKEN POSITIVE STEPS TO RESOLVE PROBLEMS THAT HAVE BEEN BROUGHT TO THEIR ATTENTION BY PARENT ADVOCATES AND PACs. IN STATES WHERE THERE IS STRONG LEADERSHIP AT THE TOP THAT IS SYMPATHETIC TO PARENT INVOLVEMENT CONCERNS, THE FEDERAL EDUCATION PROJECT HAS BEEN ABLE TO INFORMALLY OBTAIN THE DIRECT ASSISTANCE OF STATE OFFICIALS. HOWEVER, EVEN IN THESE FEW STATES, RECEPTIVITY TO PARENT ADVOCATES DOES NOT SUGGEST THAT A COMPREHENSIVE SYSTEM FOR MONITORING AND ENFORCING PARENT INVOLVEMENT REQUIREMENTS EXISTS.

THE FEDERAL GOVERNMENT HAS SHOWN BY ITS ACTION THAT PARENT INVOLVEMENT IS A LOW PRIORITY AMONG ITS TITLE I RESPONSIBILITIES. EVEN WHERE PROGRAM REVIEWS OF STATE AND LOCAL PERFORMANCE HAVE CITED THE AREA OF PARENT INVOLVEMENT AS IN NEED OF IMPROVEMENT, LITTLE, IF ANY, FOLLOW-UP HAS BEEN UNDERTAKEN TO ASSURE THAT RECOMMENDATIONS ARE IMPLEMENTED.

THE OFFICE OF EDUCATION HAS INDICATED ITS LACK OF INTEREST IN AND CONCERN WITH PARENT INVOLVEMENT IN OTHER WAYS AS WELL. FOR EXAMPLE, UNTIL 1978, THE OFFICE OF EDUCATION NEVER IN THE THIRTEEN YEARS OF TITLE I'S EXISTENCE MADE PARENTAL INVOLVEMENT THE FOCUS OF ANY OF ITS HUNDREDS OF MEETINGS AND CONFERENCES. IT TOOK A CONGRESSIONAL MANDATE IN 1978 TO PURSUADE THE OFFICE OF EDUCATION TO PROVIDE TECHNICAL ASSISTANCE TO SCHOOL OFFICIALS TO HELP THEM WORK

MORE EFFECTIVELY WITH PARENTS AND PACs. THE FIRST SUCH REGIONAL CONFERENCE TO IMPLEMENT THIS MANDATE OF CONGRESS WAS HELD LAST MONTH.

IN 1978, OE REPUBLISHED ITS 1973 BOOKLET TITLE I ESEA: HOW IT WORKS: A GUIDE FOR PARENTS AND PARENT ADVISORY COUNSILS. HOWEVER, THE MATERIAL IN THE PUBLICATION HAS BEEN OUTDATED BY THE 1974 AND 1978 REAUTHORIZATION OF TITLE I. PUBLICATION OF INACCURATE, OUTDATED, MISLEADING INFORMATION PROVIDES A CLEAR SIGNAL TO PARENTS AND ADMINISTRATORS THAT OE CARES SO LITTLE ABOUT PARENT INVOLVEMENT THAT IT HAS EXPENDED NO RESOURCES SINCE 1973 TO MAKE AVAILABLE HELPFUL OR ACCURATE INFORMATION FOR PARENTS.

ON SEPTEMBER 10, 1979, FOR THE FIRST TIME IN THE HISTORY OF THE TITLE I PROGRAM, OE ORDERED A STATE TO WITHHOLD TITLE I FUNDS FROM A LOCAL SCHOOL DISTRICT BECAUSE OF A FAILURE TO COMPLY WITH TITLE I PARENT INVOLVEMENT REQUIREMENTS. THE FEDERAL EDUCATION PROJECT APPLAUDED THE AGENCY'S ACTIONS AND SUPPORTED ITS TAKING THIS STEP, WHICH WAS A VERY SIGNIFICANT VICTORY FOR TITLE I PARENTS. HOWEVER, THE DECISION TO ISSUE SUCH AN ORDER CAME NINE MONTHS AFTER PARENTS FIRST FILED THEIR COMPLAINT WITH LOCAL SCHOOL OFFICIALS TO OBTAIN COMPLIANCE WITH PARENTS' LEGAL RIGHTS TO ELECT PAC MEMBERS OF THEIR CHOICE, UNHINDERED BY LOCAL RESTRICTIONS. THE COMPLAINT HAD TO BE APPEALED ALL THE WAY TO

THE FEDERAL LEVEL WHERE IT TOOK A LAW SUIT TO PURSUADE THE FEDERAL GOVERNMENT TO DEVELOP PROCEDURES, AS REQUIRED BY TITLE I LAW, FOR RECEIVING AND RESOLVING COMPLAINTS AND TO THEN USE THOSE PROCEDURES IN THIS CASE.

OE'S WITHHOLDING ORDER HAS BEEN APPEALED AND MEANWHILE THE AGENCY REFUSES TO USE ITS CEASE AND DESIST POWERS TO OBTAIN COMPLIANCE. IT EXCEEDED BY THREE MONTHS ITS OWN ESTABLISHED TIME-FRAMES OF 60 DAYS FOR THE COMMISSIONER OF EDUCATION TO RESPOND TO APPEALS FROM THE DEPUTY COMMISSIONER'S DECISION AGAINST THE SCHOOL DISTRICT, BRINGING TO OVER A YEAR THE AMOUNT OF TIME IT HAS TAKEN FOR THE PARENTS TO RECEIVE A FINAL RESPONSE ON THE MERITS OF THE COMPLAINT. MEANWHILE, NONCOMPLIANCE CONTINUES AND TITLE I FUNDS CONTINUE TO FLOW TO THE OFFENDING SCHOOL DISTRICT.

WITH SUCH A RECORD OF INACTION AND SLOW ACTION BY THE FEDERAL GOVERNMENT, THE DIFFICULT JOB OF PRESSING STATE AND LOCAL SCHOOL OFFICIALS TO TAKE PARENT INVOLVEMENT SERIOUSLY IS MADE HARDER.

POLICY AND RESEARCH IMPLICATIONS

IT IS CLEAR FROM THE FEDERAL EDUCATION PROJECTS' EXPERIENCE WITH TITLE I PACS THAT NONCOMPLIANCE WITH BOTH THE LETTER AND THE SPIRIT OF TITLE I'S LEGAL REQUIREMENTS FOR PARENT INVOLVEMENT IS PERVASIVE. LITIGATION AND THE USE OF

FORMAL COMPLAINT MECHANISMS HAVE LIMITED VALUE IN BRINGING ABOUT EFFECTIVE PARENTAL INVOLVEMENT, THOUGH THEY ARE BOTH CRITICAL TOOLS FOR PRESSING FOR CHANGE. ADDITIONAL STEPS MUST BE TAKEN IF EFFORTS TO INVOLVE TITLE I PARENTS IN THE EDUCATION OF THEIR CHILDREN ARE TO COME EVEN CLOSE TO ACHIEVING THE GOALS AND PURPOSES OUTLINED EARLIER IN THIS PAPER. WE MAKE THE FOLLOWING RECOMMENDATIONS:

1. LOCAL SCHOOL DISTRICTS SHOULD BE REQUIRED TO SUBMIT WRITTEN RESPONSES TO THE PAC ON EACH OF THE PAC'S RECOMMENDATIONS REGARDING EITHER THE TITLE I APPLICATION (THE PLAN FOR THE PROGRAM) OR THE EVALUATION PROCESS. THESE RESPONSES SHOULD EXPLAIN WHY ANY RECOMMENDATION WAS NOT ADOPTED IF IT WAS NOT. THE PAC SHOULD BE GIVEN AN OPPORTUNITY TO REBUTT THOSE REASONS IN WRITING. THIS CORRESPONDENCE SHOULD BE REQUIRED TO BE INCLUDED IN THE APPLICATION SUBMITTED TO THE STATE FOR FUNDING. STATES SHOULD BE AUTHORIZED TO DISAPPROVE APPLICATIONS WHICH DO NOT PROVIDE ADEQUATE REASONS FOR NOT ACCEPTING PAC RECOMMENDATIONS.

2. FEDERAL AND STATE MONITORING SHOULD BE REQUIRED TO INCLUDE INTERVIEWS BY THE MONITORS WITH THE PAC CHAIRPERSON AND SEVERAL OF THE PACS OTHER MEMBERS (AS DESIGNATED BY THE PAC TO PLAY THIS ROLE) TO ASCERTAIN THE DEGREE OF COMPLIANCE WITH PARENT INVOLVEMENT REQUIREMENTS.

3. THE FEDERAL GOVERNMENT SHOULD DEVELOP AND DISSEMINATE INFORMATION AND MATERIALS ON MODEL PAC TRAINING PROGRAMS

AND PROVIDE TECHNICAL ASSISTANCE TO LOCAL AND STATE SCHOOL OFFICIALS ON HOW TO IMPLEMENT OR ADOPT THE MODELS LOCALLY. THOUGH SECTION 125(F) OF P.L. 95-561 CALLS UPON NIE TO DEVELOP AND DISSEMINATE TRAINING MODELS, IN A LETTER TO THE FEDERAL EDUCATION PROJECT, NIE'S ACTING DIRECTOR STATES THAT NEITHER THIS ACTIVITY, NOR PLANS FOR IT, IS UNDERWAY.

4. RESEARCH SHOULD BE CONDUCTED BY THE NEW DEPARTMENT OF EDUCATION TO DETERMINE WHAT KINDS OF ASSISTANCE, MATERIALS, AND INFORMATION STATE AND LOCAL EDUCATION AGENCIES NEED TO MORE EFFECTIVELY COMPLY WITH TITLE I'S PARENT INVOLVEMENT REQUIREMENTS AND HOW BEST TO MEET THOSE NEEDS. OBVIOUSLY, TO HAVE ANY IMPACT, THE DEPARTMENT WILL THEN NEED TO FOLTOW THROUGH AND PROVIDE THAT ASSISTANCE OR FACILITATE ITS DELIVERY. STATES THEN SHOULD BE REQUIRED TO DEVELOP AND IMPLEMENT A PROGRAM TO PROVIDE ON-GOING TECHNICAL ASSISTANCE TO LOCAL SCHOOL DISTRICTS ON PARENT INVOLVEMENT. THIS WHOLE EFFORT WOULD CAPITALIZE ON THE POTENTIAL POSITIVE IMPACT OF FEDERAL AND STATE LEADERSHIP.

5. RESEARCH SHOULD BE CONDUCTED ON THE EXTENT OF COMPLIANCE WITH THE CURRENT LEGAL REQUIREMENTS FOR PARENT INVOLVEMENT. SUCH A STUDY WAS ORIGINALLY INTENDED TO BE PART OF THE NIE STUDY OF COMPENSATORY EDUCATION MANDATED BY THE 1974 TITLE I STATUTE. HOWEVER, AFTER INITIAL DIFFICULTIES WITH THE CONTRACTOR AWARDED FUNDS TO CARRY OUT THIS PART OF THE STUDY, THE RESEARCH WAS ABORTED.